

SCOTT N. SCHOOLS (SC SBN 9990)
 United States Attorney
 JOANN M. SWANSON (CA SBN 88143)
 Chief, Civil Division
 CLAIRE T. CORMIER (CA SBN 154364)
 Assistant United States Attorney

150 Almaden Blvd., Suite 900
 San Jose, California 95113-3081
 Telephone: 408-535-5082
 Facsimile: 408-535-5081
 Claire.Cormier@usdoj.gov

Attorneys for Federal Defendants

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION**

| | | |
|---------------------------------|---|--|
| SABRINA DOMINGUES, |) | C06-00911 PVT |
| |) | |
| Plaintiff, |) | |
| |) | STIPULATION AND [PROPOSED] ORDER |
| v. |) | EXTENDING EXPERT DISCOVERY |
| |) | DEADLINE |
| UNITED STATES POSTAL SERVICE OF |) | |
| THE UNITED STATES OF AMERICA, |) | |
| |) | |
| Defendant. |) | |
| _____ |) | |

This case is currently scheduled for trial on liability only beginning August 6, 2007. After a previous stipulated extension, the deadline for expert discovery is currently May 22, 2007. On May 15, 2007, counsel for the parties attended a hearing on defendant's motion to dismiss, or in the alternative, for summary judgment. The Court indicated that a ruling on that motion would be issued soon, but no order has been filed to date. Accordingly, in order to allow time for the possibility of receiving the Court's ruling prior to the time and expense of expert depositions, the parties HEREBY STIPULATE AND REQUEST that the expert discovery deadline be extended to June 15, 2007. Counsel do not believe that this modification to the case schedule should have any impact on other dates and deadlines, such as the trial date.

//

Respectfully submitted,

DATED: May 17, 2007

/s/
JOHN J. GARVEY, III, ESQ.
Attorney for Plaintiff

SCOTT N. SCHOOLS
United States Attorney

DATED: May 17, 2007

/s/
CLAIRE T. CORMIER
Assistant United States Attorney

~~[PROPOSED]~~ ORDER

Pursuant to the stipulation of the parties and good cause appearing, IT IS HEREBY ORDERED that the deadline for expert discovery shall be modified as requested above.

Dated: May 18, 2007


PATRICIA V. TRUMBULL
United States Magistrate Judge